

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the matter of: JOINT APPLICATION BY BELL SOUTH CORPORATION, BELL SOUTH TELECOMMUNICATIONS, INC., AND BELL SOUTH LONG DISTANCE, INC. FOR PROVISION OF IN- REGION, INTERLATA SERVICES IN GEORGIA AND LOUISIANA.	CC Docket No. 02-35
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AFFIDAVIT OF MARYMARGRET WILLIAMS GROOM

I, **MARYMARGRET WILLIAMS GROOM** being duly sworn upon oath, do hereby depose and state as follows:

1. My name is Marymargret Williams Groom. I am employed by Xspedius Corp. ("Xspedius"), as a Major Account Manager. In that position, I am responsible for customer sales and developing price quotes for selling local, long distance and Internet service in the Baton Rouge, Lafayette, Lake Charles and Shreveport markets in Louisiana. My business address is 3636 South Sherwood Forest Boulevard, Suite 600, Baton Rouge, Louisiana 70816. I have personal knowledge of the matters set forth in this Affidavit.

2. I am submitting this affidavit for use in support of Xspedius' opposition comments in Federal Communications Commission, Common Carrier Docket No. 02-35, and for any other lawful purpose.

3. In my dealing with customers and potential customers in Louisiana, I have discovered that BellSouth uses a variety of tactics to win back customers that have switched or contemplating a switch to Xspedius from BellSouth. These tactics include waiving fees for various services, providing customers with monetary credits, and giving customers non-tariffed rates. It also appears that BellSouth is using proprietary information obtained from Xspedius through the BellSouth wholesale unit for the benefit of its own retail units. After

Xspedius submits an order to switch an end user from BellSouth to Xspedius, or requests a copy of the Customer Service Record (CSR), a salesperson from BellSouth contacts the end user almost immediately in an attempt to convince the customer to stay with BellSouth. Xspedius customers advise me that, after not hearing from BellSouth for years, they suddenly receive a call and/or a visit right after making the decision to switch to Xspedius. The submission of the request for the CSR by Xspedius to BellSouth acts as the trigger for BellSouth to send out its winback team to the customer contemplating a switch.

4. In January of this year, while in a sales meeting with the United States Postal Service, I advised the Postal Service representative that in order to provide the Postal Service with a price quote and cost analysis, Xspedius required that the Postal Service execute a Letter of Authorization permitting Xspedius to obtain the relevant CSRs from BellSouth. I advised the representative of the Postal Service to expect a phone call from BellSouth after BellSouth received Xspedius' request for the Postal Service CSRs.

5. At a follow-up visit, the Postal Service representative advised me that he had in fact received a call from BellSouth regarding the customer service records and inquired into why the Postal Service was considering switching its service from BellSouth to Xspedius.

6. This example shows that BellSouth makes it very difficult for Xspedius to compete by leveraging its monopoly position in the market in unfair and anticompetitive ways.

7. I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing information is true and correct.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on March 1, 2002.

/s/ Marymargret Williams Groom
Marymargret Williams Groom
Xspedius Corp.

STATE OF LOUISIANA)
)
PARISH OF EAST BATON ROUGE)

Subscribed and sworn to before me this 1st day of March, 2002.

Witness my hand and official seal.

My Commission expires: at death

/s/ Kyle C. Marionneaux
Notary Public